

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE:

KEARSTON L JONES

CASE NO. 16-50962

CHAPTER 13

DEBTOR

JUDGE JOHN E. HOFFMAN JR.

OBJECTION TO CONFIRMATION

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now Faye D. English, Chapter 13 Trustee and objects to confirmation of the plan and would show this Court that in the above-referenced case the Court should enter an order denying confirmation for the reasons set forth below and dismissing the case pursuant to 11 USC §1307(c) for the following:

- X The Chapter 13 Statement of Financial Affairs, Plan, Means Test, or Schedules must be amended to reflect the changes in the following areas: The plan proposes to retain 2 vehicles with liens. The 122C-1 form discloses business expenses at line #5 - once expenses removed, case will be an above median income case. Debtor has failed to provide the support documentation for the Schedule I line #8 income disclosure. Debtor failed to provide a 6 month profit/loss statement. Trustee requests a balance sheet for the Debtor's business. Trustee requests the ongoing monthly operating reports. Addresses provided for parties Great Lakes and Veronica Joyner are incomplete. The attorney fees disclosed at A(3) of the plan exceed the no look fee. Schedule B provides 2 separate disclosures for the Debtor's business - no basis provided for the separate disclosures..
- X Payments due pursuant to U.S.C. § 1326 (a)(1) and § 1325 (a)(2) have not been made. The first plan payment has not been provided.
- The Debtors have not filed their Federal and/or State income tax return for the following year(s): 2013 & 2014. Therefore the Debtors are not able to meet the burden of proving that the Plan complies with 11 U.S.C. § 1322 (a)(2).
- X The plan does not meet the requirements of 11 U.S.C § 1322(d). The plan length projects to 97 months. The Debtor failed to provide verification of their social security number. Trustee requests a copy of the Debtor's 2015 federal tax return.

X Debtor(s) have not met with the Comptroller or the Trustee for a review of the debtor(s) business records.

Wherefore, the Trustee prays the Court deny confirmation for the reasons set forth and the case be dismissed or converted to Chapter 7, whichever shall be determined in the creditor's best interest.

Dated: 3/31/2016

Respectfully submitted,

/s/ Faye D. English

Faye D. English
Chapter 13 Trustee
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objection To Confirmation was served on the following registered ECF participants, electronically through the Court's ECF System at the e-mail address registered with the Court, or by ordinary U.S. mail, postage prepaid, on this date.

Dated 3/31/2016

/s/ Faye D. English

Electronically signed by
Faye D. English, Chapter 13 Trustee

By the Court's ECF System:

Asst. U.S. Trustee
Faye D. English, Chapter 13 Trustee
Ric Daniell Esq, Attorney for Debtor

By ordinary U.S. Mail addressed to:

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